



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

MICHAEL PESIN-VIROVETS
Senior Counsel
Email: mpvirove@law.nyc.gov
Cell: (646) 596-0583
Tel: (212) 356-2617

July 6, 2022

VIA ECF

Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Payamps v. City of New York et al.,
22-CV-0563 (AMD) (VMS)

Your Honor:

I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York ("City"), Mayor Bill de Blasio, New York City Police Commissioner Dermot Shea, New York City Police Department ("NYPD") Chief of Department Terence Monahan, Police Officer Daniel Auguste, and Police Officer Corey Johnson (collectively "Defendants") in the above-referenced matter. The undersigned writes to respectfully request a two-day enlargement of time, from July 6, 2022 to July 8, 2022 to file the parties' joint letter regarding coordinating discovery in this matter. This is Defendant's first request for such an enlargement. Plaintiff consents to this request.

By way of background, on June 28, 2022, the parties filed a Joint Proposed Case Management Plan ("CMP") along with a letter informing the Court that the parties are diligently attempting to work-out an unresolved issue as to whether Defendants would consent to a stipulation to coordinate discovery in this matter with In re NY City Policing During Summer 2020 Demonstrations, 20-CV-8924 (CM) (GWG) (S.D.N.Y.) ("Summer 2020"). In furtherance of this effort, the parties respectfully requested leave to file letters detailing any outstanding questions and the parties' respective positions by July 6, 2022.

The reason for the instant request is the undersigned has been handling a number of pressing deadlines on other matters and, as such, requires a brief extension to finalize Defendants' position as to coordinated discovery in this case. In light of the foregoing, Defendants respectfully request a two-day enlargement of time, from July 6, 2022 to July 8, 2022 to file the parties' joint letter regarding coordinating discovery in this matter.

Defendants thank the Court for its time and consideration of this request.

By: /s/ 
Michael Pesin-Virovets
Senior Counsel

cc: **By ECF**
Elena Louisa Cohen
Cohen Green PLLC
Attorney for Plaintiff

Remy Green
Cohen & Green
Attorney for Plaintiff

Jessica S. Massimi
99 Wall Street, Ste. 1264
New York, NY 10005
Attorney for Plaintiff

Gideon Orion Oliver
Attorney at Law
277 Broadway
Suite 1501
New York, NY 10007
Attorney for Plaintiff

M.K. Kaishian
Cohen & Green
Attorney for Plaintiff